

Frequently Asked Questions

AB 977



**California
Interagency Council
on Homelessness**

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Introduction

This document is intended for grantees, subgrantees, Homeless Management Information System (HMIS) Leads, and other entities involved in the process of project setup and data entry into the HMIS as identified in [AB 977](#) and [Welfare and Institutions Code section 8256](#). This document primarily focuses on questions pertaining to the ten (10) programs named in AB 977. This document is provided in addition to, not in replacement of, each state agency's project setup instructions document, which can be found on the following websites:¹

- [Cal ICH Grantee Project Setup Instructions](#)
- [CDSS Grantee Project Setup Instructions](#)
- [HCD Grantee Project Setup Instructions](#)
- [Project Setup Instructions for HMIS Leads](#)

The California Interagency Council on Homelessness (Cal ICH) has contracted with Abt Associates (Abt) as the technical assistance (TA) provider for AB 977. Questions will be added to this document from the following sources: office hours, trainings, the [AB977 TA@abtassoc.com](mailto:AB977_TA@abtassoc.com) inbox, and other TA activities. Questions are divided into five sections: general questions that apply to all programs, questions that apply to programs funded by the California Interagency Council on Homelessness (Cal ICH), questions that apply to programs funded by the California Department of Social Services (CDSS), questions that apply to programs funded by the California Department of Housing and Community Development (HCD), and questions that apply to programs funded by the California Community Colleges Chancellor's Office (CCCCO). At the end of this document is an appendix with a list of commonly used acronyms. Updates to this document will be disseminated monthly via communication channels determined by each state agency.²

For more information about any of the content in this document, or technical assistance for AB 977, please contact [AB977 TA@abtassoc.com](mailto:AB977_TA@abtassoc.com).

Programs:

- Cal ICH Homeless Housing, Assistance, and Prevention Program (HHAP)
- Cal ICH Encampment Resolution Funding (ERF) Program³
- Cal ICH Family Homelessness Challenge (FHC) Grants⁴
- CDSS Bringing Families Home (BFH)
- CDSS CalWORKs Housing Support Program (HSP)
- CDSS Housing and Disability Income Advocacy Program (HDAP)
- CDSS Home Safe (CDSS)⁵
- HCD Homekey

¹ For CCCC Project Setup Instructions, please email AB977_TA@abtassoc.com.

² Questions indicated as "NEW" are new since the last version of this document. Questions indicated as "UPDATED" have updated content since the last version of this document.

³ Grantees for Cal ICH programs enacted on or after July 1, 2021, including the Encampment Resolution Funding (ERF) Program and Family Homelessness Challenge (FHC) Grants, are already required to enter data into HMIS and are required to implement the project setup requirements of AB 977 by September 1, 2023.

⁴ See above.

⁵ CDSS's Home Safe program is not currently required to enter data under AB 977. However, per the [All County Welfare Director's Letter Dated October 15, 2021](#), CDSS does require Home Safe grantees to enter data into HMIS. CDSS encourages Home Safe grantees to set up their HMIS projects in accordance with the AB 977 Project Setup Instructions and participate in TA and training activities.

- HCD Housing for a Healthy California Program (HHC)
- HCD No Place Like Home Program (NPLH)
- HCD Multifamily Housing Program (MHP), including the following subsidiary programs:
 - Supportive Housing Multifamily Housing Program (SHMHP)
 - Homeless Youth Multifamily Housing Program (HYMHP)
- HCD Veterans Housing and Homeless Prevention Act (VHHP)
- CCCC Community Colleges Homeless and Housing Insecure Pilot Program (HHIP)

Questions That Apply to All Programs

Questions About Which Programs and Grantees Need to Comply With AB 977

1. Which grantees and subgrantees must comply with AB 977?

[Welfare and Institutions Code section 8256 \(d\)\(1\)\(A-J\)](#) mandates that beginning January 1, 2023, grantees and entities operating [specified state homelessness programs](#), as a condition of receiving state funds, must enter Universal Data Elements (Items 3.01–3.917) and Common Data Elements (Items 4.02–4.20 and Item W5 of the Individual Federal Partner Program Elements), as defined by the United States Department of Housing and Urban Development [FY 2022 HMIS Data Standards Manual](#), on the individuals and families it serves into its local HMIS, unless otherwise exempted by state or federal law. Grantees or entities that elect to subcontract services are responsible for ensuring subgrantees are in compliance with identified data reporting requirements as a recipient of state funding.

2. Are projects funded by the specified state homelessness programs that were in operation prior to 2021 required to enter data in HMIS?

Yes. [Welfare and Institutions Code section 8256 \(d\)\(1\)\(A-J\)](#) mandates that grantees and entities of [specified state homelessness programs](#) must enter data into their local HMIS without limitation, covering all projects funded by the specified state homelessness programs made, including those prior to July 1, 2021.

3. Do the data reporting requirements apply to existing grantees receiving awards after the enactment of AB 977?

Yes. In addition to the ten specified state homelessness programs required to enter data into their local HMIS without limitation, [Welfare and Institutions Code section 8256](#) applies to new grantees of the existing state programs that commence on or after July 1, 2021. This includes new awards made to existing grantees for the ten specified state homelessness programs.

4. Are state homelessness programs that existed prior to July 1, 2021, but are not named in AB 977 required to comply with AB 977 data reporting requirements?

No, these programs are not currently required to comply with AB 977.

5. Are HUD funded programs where funding is distributed to some jurisdictions by the state required to comply with AB 977?

No, these programs are not state homelessness programs because they are fully funded by the federal government, and therefore do not need to comply with AB 977. Federally funded housing programs already report into HMIS to meet HUD requirements.

6. Will grantees who do not enter data directly into HMIS but instead import data from external data systems, following HUD's HMIS CSV specifications, on a regular schedule be considered compliant with AB 977?

Yes, grantees will be considered compliant if the data is ingested into the local HMIS system and included in quarterly data uploads to the state's Homeless Data Integration System (HDIS). Data imports must include all data fields required by AB 977, follow HUD's HMIS CSV specifications, and meet Cal ICH data quality compliance requirements.

7. Are recipients/distributors of stipends for Persons with Lived Experiences of Homelessness (PLEH) required to enter stipend information into HMIS?

No, grantees are not mandated by AB 977 to enter stipend information into HMIS for Persons with Lived Experience of Homelessness (PLEH) who are participating in evaluation efforts, personal/professional development or trainings, or other related services provided by PLEH.

8. How long do new grantees of existing state funded homelessness programs have to comply with the requirements of AB 977?

New grantees of the existing state homelessness programs may be granted an extension of up to one year from program launch to meet the requirements. Program launch is generally considered the time at which a contract is executed with the state or funds are allocated. A new grantee of an existing state funded homelessness program is defined as an entity that has never received funding from that specific state program. Existing programs includes both the ten programs named in AB 977 and any new state funded homelessness programs after their one-year extension. Program specific circumstances can be discussed in consultation with Cal ICH and the administering state department.

9. If grantees are requesting an extension to comply with AB 977 is there an official form to complete or do grantees assume the extension is granted until 7/1/23?

The self-certification and extension process is over. All grantees of the ten programs listed in AB 977 with active projects must have their project set up and data entered by July 1, 2023.

10. What is the process for CoCs submitting data into California's Homeless Data Integration System (HDIS)?

The 44 separate CoCs send their data to the HDIS via a secure file transfer system. HMIS Leads upload HMIS data into Cal ICH's HDIS on a quarterly basis. Grantees do not enter data directly into HDIS. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977_TA@abtassoc.com.

11. UPDATED: Are Victim Service Providers (VSPs) prohibited from participating in HMIS?

A VSP is defined as a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Providers include rape crisis centers, domestic violence shelter and transitional housing programs, and other programs. A VSP is a designation at the agency level, not the project level.

VSPs are prohibited from entering client data into HMIS. This includes those agencies who meet the definition above and those who receive funds through the U.S. Department of Health and Human Services (HHS) Family Violence Prevention and Services Act (FVPSA), the U.S. Department of Justice (DOJ) Office of Victims of Crime (OVC), or DOJ Office of Violence against Women (OVW), and who use those funds to help support projects serving survivors of domestic violence, dating violence, sexual assault, or stalking. VSPs are not subject to any reporting requirements under AB 977.

12. If a project is scheduled to open after July 1, 2023, how would the grantee meet the July 1, 2023, deadline?

Projects that do not have active clients on July 1, 2023, do not need to enter data by July 1, 2023. Data must be entered beginning on the first day when the first individual or household is served by the project. In order for a grantee to be fully set up in HMIS and entering data for all clients served on the

first day housing or services are provided, Cal ICH recommends grantees initiate the process of setting up projects in HMIS 90 days in advance of initial occupancy.

13. Is there a way for a grantee to get a list of clients that have been entered into HMIS to ensure compliance with AB 977?

Grantees should work with their service providers or subcontractors who are entering data into HMIS to ensure client information is being entered into HMIS. HMIS users can also work with the local HMIS Lead to ensure data are being entered into HMIS correctly. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977_TA@abtassoc.com.

Questions About Project Setup and Ongoing Client-Level Data Entry

14. Does participation in Coordinated Entry (CE) count as HMIS participation for AB 977?

No. Grantees must set up projects that align with their project activities (housing, shelter, and/or services) and enter client data into these projects. Entering clients into their CoC's CE project(s) does not constitute compliance.

Certain programs specified in AB 977 may allow a portion of program funding be spent on the CoC's Coordinated Entry System (CES). In these cases, the CE project(s) in HMIS that are being funded should enter the program's funding code to indicate the CE project is receiving program funding specifically to support the CES.

15. Will Cal ICH have a protocol for naming projects?

No, Cal ICH will not be providing a protocol for naming projects. Administering state departments may provide guidance on naming conventions, and some local HMIS Leads have standard naming conventions. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977_TA@abtassoc.com. Cal ICH will be using funding code fields (other funder text and grant ID) to identify projects.

From the [FY 2022 HMIS Data Standards Manual](#): While the project name is not required to match grant agreements, the project name should be consistent with the name used across reports (e.g., Annual Performance Report and Housing Inventory Count).

16. Which AB 977 projects should be set up using the continuum project field in HMIS?

Continuum Projects are defined in the HUD [FY 2022 HMIS Data Standards Manual](#) as follows: "A project within the geographic boundaries of the Continuum(s) of Care served by the HMIS whose primary purpose is to meet the specific needs of people who are homeless by providing lodging and/or services. A continuum project is not limited to those projects funded by HUD and should include all of the Federal Partner projects and all other federally or non-federally funded projects functioning within the continuum."

Projects that are limited to serving individuals experiencing homelessness should be marked as Continuum. See [this question](#) for more information on projects that serve clients who are at-risk of homelessness. For more information about the continuum project field, contact the local HMIS Lead. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977_TA@abtassoc.com.

17. When do development projects that are not yet serving clients need to have projects set up in HMIS?

AB 977 requires grantees operating specified state homelessness programs to enter data on individuals and families served into its local HMIS. For interim or permanent housing construction, acquisition, or rehabilitation projects, data must be entered beginning on the first day when the first individual or household is served by the program. In order for a grantee to be fully set up in HMIS and entering data for all clients served on the first day housing or services are provided, Cal ICH recommends grantees initiate the process of setting up projects in HMIS 90 days in advance of initial occupancy.

18. **UPDATED:** How should grantees set up projects in HMIS, particularly when projects provide a broad range of activities?

Grantees should create an HMIS project for each project type separately as defined by HUD guidance. The Abt TA team issued program-specific guidance on the project type field as part of the [project setup instructions](#) released by each administering state department. The Abt TA team is providing additional support to grantees through regular office hours, the email helpdesk, targeted one-on-one TA requests, and recorded and live trainings. Grantees can work with their HMIS Lead and the Abt TA team to identify the project type appropriate to their specific circumstances. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977_TA@abtassoc.com.

19. What are the requirements for a project to have the project type of permanent supportive housing (PSH)?

There are several types of permanent housing categories within HMIS. The following answer serves as general guidance, but grantees can work with their HMIS Lead and the Abt TA team to identify the project type appropriate to their specific circumstances.

PSH - Permanent Supportive Housing (disability required for entry): A project that offers *permanent housing and supportive services* to assist homeless persons with a disability (individuals with disabilities or families in which one adult or child has a disability) to live independently. For purposes of HMIS project set-up, a project does not have to be targeted to people who are chronically homeless to be considered PSH; however, many CoCs have prioritized PSH in that way.

In contrast, a project that offers permanent housing (PH) to assist persons experiencing homelessness without a disability requirement would be set up as a different project type under Permanent Housing, depending on the length of assistance and whether or not services are also provided to clients: **Rapid Rehousing** (short to medium term rental assistance and services), **Permanent Housing with Services** (longer term housing with services), or **Permanent Housing – Housing Only** (longer term housing with no services).

20. How should projects serving clients who are at risk of homelessness be set up in HMIS?

The only project type serving clients who are at-risk of homelessness (i.e., where homelessness is not an eligibility requirement) that should be set up as a continuum project is Homelessness Prevention (HP).

Homelessness Prevention is defined as follows: A project that offers services and/or financial assistance necessary to prevent a person from moving into an emergency shelter or place not meant for human habitation.

Other project types (e.g., Permanent Housing Only, Permanent Housing with Services, Other) serving clients who are at-risk of homelessness should be designated as non-continuum projects. Non-continuum projects should still be set up with the project type that best reflects their service model.

21. If grantees have one funding source that is used to provide funding to multiple types of projects, do two projects need to be set up with different project types?

Yes. If grantees are using the same program funding for multiple types of projects, for example, emergency shelter (e.g., motel stay) and permanent housing, they would need to be set up as two separate projects with two different project types.

22. NEW: Should a separate project be set up in HMIS for each subgrantee or contracted providers of a program?

Grantees are responsible for ensuring compliance for their subgrantees and contracted providers. Cal ICH recommends that grantees that are creating new projects in HMIS create separate projects in HMIS for each subgrantee. For example, if there are two subgrantees or contracted providers that both offer Rapid Rehousing (RRH) with HHAP funding, the projects in HMIS would be: (1) Provider 1: RRH-HHAP, and (2) Provider 2: RRH-HHAP. This will allow grantees to monitor AB 977 compliance for each organization operating their program. Please see the relevant agency Project Setup Instructions for additional information. Links to the most up-to-date version of these documents can be found in the [Introduction](#) section of this document.

23. Is a bed the same as a bedroom?

Not necessarily. Bed is to persons as unit is to households. The number of beds in a project should be determined by how many people it has the capacity to serve (on average). So, if it is all one-bedroom units serving single people, the number of beds would be the same as the number of bedrooms. But if the project has an average occupancy of 2 people per bedroom, the bed count would be twice the number of bedrooms. More likely it's somewhere in between. The number of beds can be calculated based on average household size. So, if a project has 10 units and the average household size is 3, the project will have 30 beds, even if there are only 20 bedrooms.

Per the [FY 2022 HMIS Data Standards Manual](#), projects that do not operate with a fixed number of beds or units that “provide housing rental assistance and have a fixed number of vouchers should determine the number of beds and units based on the number of vouchers currently funded and available for use. Projects that provide emergency shelter or housing rental assistance vouchers and without a fixed number of units or vouchers (e.g., Emergency Shelter-hotel/motel project, Rapid Re- Housing, some scattered site PH-Permanent Supportive Housing) should determine the number of beds (and units) based on the maximum number of persons (and households) who can be housed on a given night.”

24. If a grantee needs to set up new projects to align with updated project setup guidance, do they need to transfer existing client records into the new projects or only enter client data for enrollments that occur after the new projects were set up?

Any active client (new or existing) is required to be entered into the “new” project at the time the new project is set up for the purposes of AB 977 compliance.

Grantees should work with their local HMIS Lead to ensure that client records are handled in a way that will minimize impact on reporting. Generally, the preferred approach is for the HMIS Lead to facilitate a complete transfer of the client record from the “old” project to the “new” project.

Historical records for clients that have already been exited from the old project at the time of the new project setup date would not need to be transferred to the new project, unless the organization wants complete historical records for reporting purposes. Cal ICH encourages grantees to migrate data back to January 1, 2023, when feasible.

25. Will grantees who receive an extension to July 1, 2023, be required to retroactively enter data for clients who enroll in funded projects on/after January 1st or only clients who enroll on/after July 1st?

Grantees receiving an extension will be required to enter all current clients (new and existing) being served by the program on (and after) July 1, 2023. Grantees are not required to enter data for clients who were served between Jan 1, 2023, and June 30, 2023, and are no longer receiving services. Cal ICH encourages grantees to migrate data back to Jan 1, 2023, when feasible.

26. What does it mean for a client to be active?

Active refers to a client being enrolled in the project (has a project start date) and not yet exited from the project (does not have a project exit date). All clients who are currently being served in a project, regardless of whether they entered the project last week or 10 years ago, need to be entered by July 1, 2023, or whenever the project is set up.

27. Will grantees need to enter all existing clients who are actively enrolled in a funded project on the date the project is set up in HMIS?

Yes, grantees will be required to enter existing clients who are actively enrolled in a project on the date that the project is set up to ensure accurate data on how many people are being served by state homelessness programs. All project-level and client-level data should reflect actual project start dates if different than the date the project is set up in HMIS. Cal ICH recognizes that grantees may be unable to complete certain Common Data Elements (CDEs) for existing clients who entered the project in prior years. Grantees should consult their agency’s HMIS Project Setup Instructions for more details on which CDEs are required to be collected at which data collection stage. Grantees can work with the Abt TA team for assistance.

28. What is the difference between the project operating start date and the client project start date?

The project operating start date is tied to the project and is the date the project began providing services and/or housing. This should match the date the first client was served in the project and can be in the future if the project has not yet started serving clients. The client project start date is tied to the client and is the date the client started receiving services from the project. The client project start date cannot be earlier than the project operating start date.

29. UPDATED: Can grantees or entities have closed HMIS projects set up to protect client privacy?

Yes, grantees can use a closed HMIS project set up when necessary to protect client privacy or as required by local HMIS configuration. Data must be included in the quarterly data uploads to the state’s

Homelessness Data Integration System (HDIS). The local HMIS Lead and CoC Leadership manage the Privacy Notices and policies and procedures for client data privacy and security in the local HMIS. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977_TA@abtassoc.com. There may be specific cases where grantees and/or subgrantees are considered Victim Service Providers (VSPs) and are therefore prohibited from participating in HMIS. Cal ICH and/or the Abt TA team will address these questions on a case-by-case basis.

30. Do grantees receive verification or reports to ensure projects are properly set up in HMIS?

Grantees will not receive verification from Cal ICH when projects are set up in HMIS. Grantees should communicate with their HMIS Lead to confirm projects are set up and clients are being entered accurately. Cal ICH will monitor compliance through reports from California's [Homeless Data Integration System \(HDIS\)](#), a state data warehouse that aggregates data from local HMIS systems. Abt will provide TA in coordination with HMIS Leads to address compliance and data quality issues.

31. Is there a deadline for when grantees need to enter data on an ongoing basis?

Data should be entered in a timely manner in alignment with CoC policies and HMIS best practices. Cal ICH will be verifying data after receipt of quarterly data uploads. All data should be entered by the time the quarterly upload is provided to Cal ICH. Grantees should confirm with their CoC the deadline for data to be captured in that upload.

32. How should data be entered for clients who are served by both Emergency Shelter (ES) and Rapid Rehousing (RRH) projects?

For clients who are provided with Emergency Shelter (ES) at the same time as enrolling in a Rapid Rehousing (RRH) project, they would enroll (receive a project start date) in HMIS to both the ES and RRH concurrently. Once the client moves into housing with the assistance of RRH, they would be *exited* from the ES project. In the RRH project, the client would receive a "Housing Move-in Date" on the date they move into permanent housing. The client would remain enrolled in the RRH project as long as they are receiving rental assistance and/or services, including case management, from the RRH project. The client is considered permanently housed after their "Housing Move-in Date." This remains true even if there is only one funding source for the two different project types.

33. UPDATED: How should data be entered for clients who are served by both Homelessness Prevention (HP) and either permanent housing or shelter/temporary housing projects?

Clients should not be enrolled in a Homelessness Prevention (HP) project at the same time as a permanent housing or shelter/temporary housing project. HP projects are meant to serve clients at risk of experiencing homelessness, while permanent housing and shelter/temporary housing projects are meant to serve people experiencing homelessness. If clients lose their permanent housing, clients should be exited from HP projects. If clients are then enrolled in permanent housing and/or shelter/temporary housing projects that receive AB 977 funding, or other funding that requires HMIS data entry, the clients would be enrolled in the appropriate HMIS project with a start date that matches the first date they received housing or services.

34. Are grantees required to enter every Common Data Element (CDE) and Federal Partner Data Element W5 – Housing Assessment at Exit for all project types?

Grantees must collect and enter the Universal and Common Data Elements in accordance with HUD's [HMIS Data Dictionary](#), which specifies the applicability of each data element in terms of project type and who the data should be collected about. Grantees should collect and enter data appropriate to that project type. For example, a "Rapid Rehousing Project" would not be required to enter "Emergency Shelter Bed Night." HUD also requires certain additional data elements, known as Federal Partner Program Elements, for certain federal programs. Federal Partner Data Element W5 is required for projects that receive funding from the HUD: Housing Opportunities for Persons with AIDS (HOPWA) program for all project types, or from the HUD: Emergency Solutions Grant (ESG) or HUD: Continuum of Care (CoC) programs for Homelessness Prevention projects.

35. For projects where only some of the clients served are experiencing homelessness, which clients should be entered?

Client data should be entered for all units that are restricted to serving the target population of people who are experiencing or at-risk of homelessness.

36. Are HMIS entries required for clients who receive one-time assistance?

Yes, clients who receive one-time assistance should still be entered into HMIS.

Questions About Funding, Other Funder Codes, and Grant IDs

37. Will Cal ICH have a protocol for identifying state funding sources?

Yes, Cal ICH has developed a convention to identify state funding sources that are used to fund projects in HMIS. Cal ICH will use the HMIS fields in the Funding Sources data element ('Funding Program' other funder field and 'Grant ID') to identify projects funded by state homelessness programs identified in AB 977. The funding codes and grant IDs that should be entered into the open text fields are provided in the Project Setup Instructions for each agency. Program and grantee-specific identifiers are also provided in these documents to enter in the 'Grant ID' field for each funding source entered.

38. How do grantees enter data for multiple grants funding the same project(s)?

Grantees are required to enter funding information as specified by Cal ICH and any information as required by other funders, including HUD and the HMIS Federal Partners. Grantees can link multiple funding sources to one project. Each funding source can have its own period of performance identified with grant start and end dates. All clients enrolled in a project during a funding source's period of performance will be counted in funding-source specific reports generated from HDIS for the purposes of AB 977 compliance.

39. For HMIS projects that are funded with multiple funding sources throughout the year, a few months at a time, is HMIS able to track the individual funding timelines if the project never ends? For example, if a report is run for program funding from Jan 2021 - Dec 2022 will the report only pull the data for the specific months the project was funded?

When the funding code and the grant identifier are entered into HMIS, there is also a space to enter the grant start date. There are dates around when funding rounds occur, and every program is a little different regarding its rounds, contracts, or allocations. Grantees should enter the grant start date (and end date if the grant funding has ended). For nuances of entering funding information and running

reports in specific HMIS software, please reach out to the local HMIS Lead. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977_TA@abtassoc.com.

40. Are there any protocols if there is an interruption in funding resulting in no clients enrolled in a specific project(s) for a period of time? Should grantees create a new project (with a new funding source record) once clients are served again?

There are many ways to handle an “interruption” in funding depending on the project reporting needs, and most do not involve starting and stopping whole projects, but rather updating the funding sources tied to the projects as needed. If project operations are paused, the grantee should work with the HMIS lead to determine how to address associated bed/unit inventory records and to ensure any active clients are exited from the project if they are no longer being served during the project hiatus. However, if clients are still being served with other funding, the project must remain open, and an end date must be entered for the funding source. The Abt TA team is available to provide project-specific guidance as needed.

41. UPDATED: How should funding sources be set up in HMIS if projects receive funding from non-AB 977 programs?

If a project is already receiving funding from a source not listed in AB 977, the AB 977 program’s funding codes should be added to the existing HMIS project. No changes need to be made to the client records. Grantees *should not* create a new project for each funding source.

If funding for a program included in AB 977 has ended, but the project will continue operating, a funding end date should be entered for the identified program and the other funding should be left as active (i.e., no end date entered).

42. What should the grant start date be if the grantee has already been using the program’s funds for the project prior to setting up the project in HMIS?

The grant start date in HMIS should reflect the actual date the project first received that program funding, such as execution of a contract, release of a County Fiscal Letter, or other means of formal receipt of funding.

Questions That Apply to California Interagency Council on Homelessness (Cal ICH) Programs

Questions About Which Programs and Grantees Need to Comply With AB 977

43. Do the requirements of AB 977 apply to tribal grantees of Cal ICH programs?

AB 977 does not require tribal grantees to enter data into HMIS because tribes are considered sovereign entities with their own land and programs and do not currently have their own local HMIS. However, given the breadth of programs funded through the State, an entity administering homelessness funding may separately require their grantees to enter data into HMIS. In those scenarios, tribal entities will need to engage with the entity administering their funding to determine what program-specific data entry requirements must be followed. Cal ICH does not currently require their tribal grantees to report data to Cal ICH or enter data into HMIS. Even though AB 977 does not require tribal grantees to enter data into HMIS, the Abt TA team will provide TA to those tribal grantees that want to enter data into HMIS.

44. NEW: Does the September 1, 2023, deadline apply to both ERF1 and ERF2?

Yes, the September 1, 2023, deadline applies to both ERF1 and ERF2. If you have concerns about meeting that deadline, please reach out to AB977_TA@abtassoc.com.

Questions About Funding, Other Funder Codes, and Grant IDs

45. What should Cal ICH grantees enter into the Other Funder text box and Grant Identifier fields in HMIS?

Information on what to enter in the Other Funder text box and the Grant Identifier fields in HMIS is provided in the *Funding Sources* section and *Table 3* in the Cal ICH Grantee Project Setup Instructions and the Project Setup Instructions for HMIS Leads. Links to the most up-to-date version of these documents can be found in the [Introduction](#) section of this document.

46. What contract numbers should Cal ICH grantees who receive multiple disbursements of funding for the same grant use in the Grant ID field in HMIS?

When grantees receive multiple disbursements of funds as part of a single round of a Cal ICH grant program (ex: HHAP 3), grantees may continue using the first contract number in that program's round when creating the Grant ID (i.e., may continue to use the contract number from the HHAP 3 Initial Disbursement).

47. If a City, County, or CoC applied for HHAP through a joint application or there was a redirection of funds, which Grantee ID should be used?

The Grant ID should be the Grantee ID for the jurisdiction applying on behalf of the joint applicants or the jurisdiction receiving the redirected funds.

48. If a project receives funds that originate from two different HHAP grantees (e.g., a County and a CoC), which Grantee ID should be used?

In HMIS, the project should have two different Grant IDs reflecting the Grantee IDs for each HHAP grantee and their respective contract numbers. Grantees should enter the HHAP funding code twice with the two different Grantee IDs.

49. Can multiple rounds of HHAP funds be used for the same HMIS project or do two projects need to be set up, one for each funding source?

Multiple funding sources can be connected to a single project – the grantee just needs to make sure that they enter other funder text and grant identifiers separately for each round.

Questions That Apply to California Department of Social Services (CDSS)

Questions About Which Programs and Grantees Need to Comply With AB 977

50. Do the requirements of AB 977 apply to tribal grantees of CDSS programs?

In accordance with Cal ICH AB 977 guidance, CDSS is not requiring tribal grantees to comply with AB 977 requirements at this time. However, technical assistance is available to those tribal grantees that want to enter data into HMIS.

51. The Project Setup Instructions say that Victim Service Providers (VSPs) are prohibited from participating in HMIS. Does that include Adult Protective Services (APS)?

No, Adult Protective Services (APS) is not included in the Victim Service Provider (VSP) restriction. A VSP is defined as a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Providers include rape crisis centers, domestic violence shelter and transitional housing programs, and other programs. A VSP is a designation at the agency level, not the project level.

VSPs are prohibited from entering client data into HMIS. This includes those agencies who meet the definition above and those who receive funds through the U.S. Department of Health and Human Services (HHS) Family Violence Prevention and Services Act (FVPSA), the U.S. Department of Justice (DOJ) Office of Victims of Crime (OVC), or DOJ Office of Violence against Women (OVW), and who use those funds to help support projects serving survivors of domestic violence, dating violence, sexual assault, or stalking. For more information regarding setting up “closed” or “private” projects in HMIS, please refer to [this question](#).

52. Are Home Safe clients required to be entered into HMIS starting July 1, 2023? And does this include entering data for historical clients or only new clients?

Home Safe grantees are not currently required to enter data into HMIS under AB 977; however, per the [All County Welfare Director’s Letter Dated October 15, 2021](#), CDSS does require Home Safe grantees to enter data into HMIS. There is not currently a deadline for Home Safe grantees to enter data into HMIS. Once grantees enter data into the HMIS they only need to enter data for active cases (i.e., do not need to enter historical cases).

53. Does the term “homeless” in the context of AB 977 have the same definition as HUD’s definition/categories 1, 2, 3, and 4?

Yes, the terms “homeless” or “experiencing homelessness” in AB 977-related materials refer to an individual or family who falls under the definition of homelessness pursuant to the HUD definition of Homelessness in [24 CFR section 91.5 under “Homeless” Sections \(1\)-\(4\)](#). Note that there are some nuances regarding the definitions of at-risk of homelessness for eligibility for CDSS programs. Please consult the program’s definition of at-risk of homelessness.

Questions About Project Setup and Ongoing Client-Level Data Entry

54. If a CDSS-funded grantee provides rapid rehousing, assists with motels, and provides homelessness prevention, does there need to be a separate HMIS project for each type?

Yes. If the program offers these services (rapid rehousing, emergency shelter, and prevention services) using CDSS program funding, then three separate projects need to be setup with the appropriate project type assigned to each one.

55. What are the rules around the HMIS data entry requirements for Bringing Families Home (BFH) families and AB 977, specifically around HIV/AIDS status.

There is no universal rule about HIV data collection and the CoC's privacy notice dictates what can and cannot be collected/used in the local HMIS. For concerns about sharing client data with other HMIS participating organizations in the CoC, please refer to [this question](#) regarding setting up "closed" or "private" projects in HMIS.

56. For Bringing Families Home (BFH) projects, should grantees enter children into HMIS who are not residing with the biological parent in the BFH project (e.g., the family is engaged in family reunification and the child is in out-of-home care)?

The following is based on HUD's guidance on household enrollments and project start dates in the HMIS Data Standards:

For residential projects, household enrollments should only include family members who are currently living with the household in the project unit. Project start dates for each family member should reflect the actual dates they are staying in the project. Generally, children that are not currently living with the family should not be enrolled with a project start date if and until they are reunited with the family. Note that project start dates are used to calculate the length of time people experience homelessness, so enrolling a child while they are placed with a foster family or in care elsewhere would count that time as time the child was experiencing homelessness.

For non-residential projects (Street Outreach, Services Only) or enrollments in residential projects before being housed (Rapid Re-Housing project before move-in date), enrollments should only include family members who would be living with the household if they were housed or in shelter. Generally, children placed with a foster family or in care elsewhere would not be included in this consideration. Please reach out to the AB977_TA@abtassoc.com inbox with any nuanced situations related to this guidance.

Relationship to Head of Household: A household is a single individual or a group of persons who apply together to a continuum project for assistance and who live together in one dwelling unit, or, for persons who are not housed, who would live together in one dwelling unit if they were housed.

Project Start Date: Data Collection Instruction: Record the month, day, and year of each client's project start. The project start date indicates a client is now being assisted by the project. Each individual client in a household will have their own project start date. If a new client is added to a household after the original household members' start dates, the new client's start date should reflect the actual day that client enrolled in the project.

Questions About Funding, Other Funder Codes, and Grant IDs

57. Are there HMIS funder code and grant IDs for other core services (i.e., CalWORKs and CalFresh) that are required by CDSS programs?

Beyond the CalWORKs Housing Support Program (HSP), other CalWORKs and CalFresh programs are not covered by AB 977 and thus do not have assigned funding codes. Funding codes have only been provided for programs impacted by AB 977.

58. For CDSS programs, is the 2-digit number after the grant identifier the county code or some other number?

Yes, it's the county code, which is the same code used in other CDSS reporting. The county code can be found in the CDSS Grantee Project Setup Instructions and the Project Setup Instructions for HMIS Leads. Links to the most up-to-date version of these documents can be found in the [Introduction](#) section of this document.

59. If a county is applying two rounds of the same CDSS funding source to a project, should these be added as two different funding sources?

Both rounds should be added as a single funding source. For all CDSS programs the funding code should be the program acronym (e.g., BFH) followed by the county code (which is the same across all CDSS programs). This information is also in the CDSS Project Setup Instructions document—a link to the most up-to-date version of this document can be found in the [Introduction](#) section of this document. This is the same for all years or rounds that the project received funding. For the grant start date, enter the start date of the project in HMIS or the first date of client enrollment in the CDSS-funded program's HMIS project. The grant end date should be left blank until the project no longer receives funding from the program.

Questions That Apply to California Department of Housing and Community Development (HCD) Programs

Questions About Which Programs and Grantees Need to Comply With AB 977

60. NEW: Do the requirements of AB 977 apply to tribal grantees of HCD programs?

In accordance with Cal ICH AB 977 guidance, California Department of Housing and Community Development (HCD) is not requiring tribal recipients to enter data into HMIS at this time because tribes are considered sovereign entities and do not have their own local HMIS. However, technical assistance is available to those tribal recipients that want to enter data into HMIS.

61. Are HOME and Community Development Block Grant (CDBG) funded programs required to enter data into HMIS?

HOME and CDBG are not subject to the reporting requirements of AB 977. HOME and CDBG are funded by the Department of Housing and Urban Development (HUD) and grantees should refer to HUD's HMIS reporting requirements.

62. Are grantees required to enter data for projects that received state funding from one of the programs listed in AB 977 if the funding was first disbursed more than 10 years ago?

Yes. As long as the project is still in operation, the project needs to be set up in HMIS. Data should be entered for active clients, as well as new clients after project set up. For older projects, there is lenience on the Common Data Elements (CDEs) that need to be entered for clients that enrolled in the project before it was set up in HMIS, but CDEs must be collected at project start for all clients who enter the project on or after July 1, 2023, or if the project is set up in HMIS before July 1, 2023. All project information should be entered into HMIS as accurately as possible, i.e., funding and project start date being in the early 2000s.

63. UPDATED: Are HCD grantees who are developers responsible for AB 977 reporting requirements?

The grantee (i.e., recipient of state funds) is responsible for ensuring AB 977 compliance. However, there are many different options for achieving compliance that can involve the developer, service providers (or other providers), and/or HMIS Lead. It is up to the grantee to determine who should be providing and entering information into HMIS. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977_TA@abtassoc.com. If there are additional people who should be aware of office hours, training, and other outreach communications, please email the names, contact information, and relevant projects to AB977_TA@abtassoc.com.

64. Which Multifamily Housing Program projects are required to comply with AB 977?

The Multifamily Housing Program (MHP) is identified in AB 977 as one of the state homelessness programs that must report data in HMIS. All MHP projects that have special needs units restricted to serving people experiencing homelessness must comply with the requirements of AB 977.

MHP projects that do not have units restricted to serving people at risk of homelessness or experiencing homelessness are not required to enter data into HMIS. If MHP projects without units restricted to people at risk of or experiencing homelessness choose to enter data into HMIS, they must be set up as non-Continuum projects.

Questions About Project Setup and Ongoing Client-Level Data Entry

65. NEW: Can a project funded by Homekey be set up as an Emergency Shelter (ES) or Transitional Housing (TH) in HMIS?

Projects should be set up in accordance with the HMIS project type that most closely aligns with the project activities. Per the [FY 2022 HMIS Data Standards Manual](#), an Emergency Shelter is “a project that offers temporary shelter (lodging) for the homeless in general or for specific populations of the homeless. Requirements and limitations may vary by program, and will be specified by the funder.”

Note that Transitional Housing is a similar, but different, project type that “provides temporary lodging and is designed to facilitate the movement of homeless individuals and families into permanent housing within a specified period of time, but no longer than 24 months. Requirements and limitations may vary by program and will be specified by the funder.” Grantees can work with their HMIS Lead and the Abt TA team to identify the project type appropriate to their specific circumstances. For more information on how to contact the local HMIS Lead, please email the Abt TA team at AB977_TA@abtassoc.com.

Grantees with questions about whether their project conforms with the eligible uses of their funding program should consult with the appropriate state department.

Questions That Apply to California Community Colleges Chancellor's Office (CCCCO) Programs

Questions About Which Programs and Grantees Need to Comply With AB 977

66. Do colleges need to enter all Community Colleges Homeless and Housing Insecure Pilot Program (HHIP) participants in HMIS?

Colleges should enter students into HMIS who receive HHIP-funded services when the project's primary purpose is to (1) meet the specific needs of people who are homeless by providing lodging and/or services, and/or (2) serve clients at-risk of homelessness with homelessness prevention (services and/or financial assistance) to stabilize their housing.

67. Do colleges have to be set up in HMIS to enter client information if the housing providers that the college is partnering with are already set up in HMIS?

If the college is providing direct services to students experiencing homelessness or at risk of homelessness with the HHIP program, the college will need to set up an HMIS project and enter client data. If the college is referring students to a partner organization for HHIP services, the partner organization will need to set up an HMIS project and enter client data. In cases where both the college and the housing partner are providing direct services, they will both need to enter client data.

Appendix A: List of Acronyms

Acronym	Meaning
Abt	Abt Associates
AIDS	Acquired Immunodeficiency Syndrome
APS	Adult Protective Services
BFH	Bringing Families Home
Cal ICH	California Interagency Council on Homelessness
CCCCO	California Community Colleges Chancellor's Office
CDBG	Community Development Block Grant
CDEs	Common Data Elements
CDSS	California Department of Social Services
CE	Coordinated Entry
CES	Coordinated Entry System
CoC	Continuum of Care
DOJ	U.S. Department of Justice
ERF	Encampment Resolution Funding Program
ES	Emergency Shelter
ESG	Emergency Solutions Grant
FAQs	Frequently Asked Questions
FHC	Family Homelessness Grants
FVPSA	Family Violence Prevention and Services Act
FY	Fiscal Year
HCD	California Department of Housing and Community Development
HDAP	Housing and Disability Income Advocacy Program
HDIS	Homeless Data Integration System
HHAP	Homeless Housing, Assistance, and Prevention Program
HHC	Housing for a Healthy California Program
HHS	U.S. Department of Health and Human Services
HHIP	Community Colleges Homeless and Housing Insecure Pilot Program
HIV	Human Immunodeficiency Virus
HMIS	Homeless Management Information System
HOPWA	Housing Opportunities for Persons with AIDS
HP	Homelessness Prevention
HSP	CalWORKs Housing Support Program
HUD	Department of Housing and Urban Development
HYMHP	Homeless Youth Multifamily Housing Program
MHP	Multifamily Housing Program
NPLH	No Place Like Home Program
OVC	Office of Victims of Crime
OVW	Office of Violence against Women
PH	Permanent Housing
PLEH	Persons with Lived Experiences of Homelessness
PSH	Permanent Supportive Housing
RRH	Rapid Re-Housing
SHMHP	Supportive Housing Multifamily Housing Program
TA	Technical Assistance

UDEs	Universal Data Elements
VHHP	Veterans Housing and Homeless Prevention Act
VSP	Victim Service Provider